IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF WISCONSIN

UNIVERSITY OF WISCONSIN HOSPITAL AND CLINICS, INC. and UNIVERSITY OF WISCONSIN MEDICAL FOUNDATION, INC.,

Case No. 14-cv-803

Related Cases:

Case No. 12-cv-031-wmc

v.

AIR PRODUCTS AND CHEMICALS, INC., AS SUCCESSOR PLAN ADMINISTRATOR TO EPCO CARBON DIOXIDE PRODUCTS, INC., HEALTH PLAN,

Defendant.

Plaintiffs,

JOINT MOTION FOR STAY OF FURTHER PROCEEDINGS PENDING

Plaintiff and Defendant, through their respective and undersigned counsel, jointly move the Court to stay further proceedings until the pending dispositive motions that may resolve these proceedings in whole or in part are ruled on by the Court.

This includes vacating the existing trial dates of January 11 and 12, 2016. If material disputes of fact remain, the Plaintiffs will be seeking discovery, as requested in their motions to the Court previously filed. Defendants oppose discovery.

Dated: December 8, 2015

NEUBERGER, GRIGGS, SWEET & SMITH, LLP Attorneys for Plaintiffs

By: /s/ Mark S. Sweet

Mark S. Sweet, SB No. 1019001 Nicole N. Schrier, SB No. 1081908 Anne MacArthur, SB No. 1018713

136 Hospital Drive Watertown, WI 53098

(920) 261-1630 FAX: 920-261-0339

Email: nschrier@nlgslaw.com

Dated: December 8, 2015 MORGAN, LEWIS & BOCKIUS, LLP Attorneys for the Defendants

By: /s/ Jeremy P. Blumenfeld

Jeremy P. Blumenfeld (pro hac vice)

1701 Market Street

Philadelphia, PA 19103-2921 Telephone: (215) 963-5258

Fax: (215) 963-5001

Email: jblumenfeld@morganlewis.com

Erin E. McAdams

MORGAN, LEWIS & BOCKIUS LLP

77 West Wacker Drive

Chicago, Illinois 60601-5094

(312) 324-1000

(312) 324-1001 (fax) emcadams@morganlewis.com